Service of the within and receipt of a c
thereof is hereby admitted this 23rd
of September A.D. 1971.

Copy of Service Enclosed

OCT 8 1971

FILE COPY

Supreme Court, U. S.
FILED
OCT 12 1971
MICHAEL RODAK, JR., CLERK

IN THE

Supreme Court of the United States

OCTOBER TERM, 1971

HARRIET JAMES ATKINS, JR., *Petitioner*
v.
STATE OF CALIFORNIA
No. 69-5037

On Writ of Certiorari to the Supreme Court of California

WILLIAM HENRY FURMAN, *Petitioner*
v.
STATE OF GEORGIA
No. 69-5003

On Writ of Certiorari to the Supreme Court of Georgia

LUCIUS JACKSON, *Petitioner*
v.
STATE OF GEORGIA
No. 69-5030

On Writ of Certiorari to the Supreme Court of Georgia

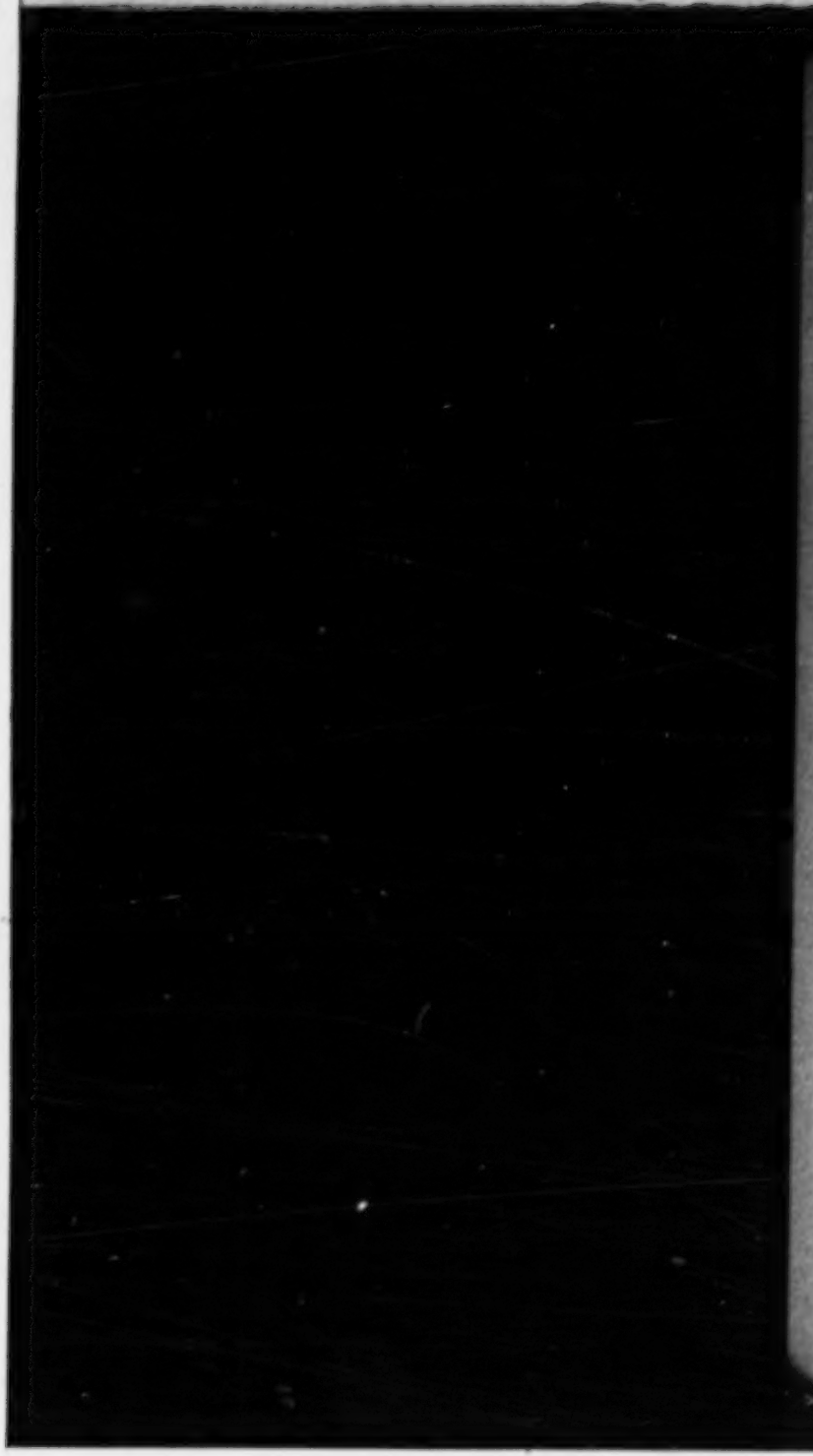
ELMER BRANCH, *Petitioner*
v.
STATE OF TEXAS
No. 69-5031

On Writ of Certiorari to the Texas Court of Criminal Appeals

MOTION FOR LEAVE TO FILE BRIEF AMICI CURIAE AND BRIEF AMICI CURIAE IN SUPPORT OF PETITIONERS

[*Amici Curiae* and attorney listed on inside cover]

PRESS OF ESTEN S. ADAMS PRINTING, INC., WASHINGTON, D. C.



INDEX

	Page
Motion for Leave to File Brief Amici Curiae	1-M
Brief Amici Curiae in Support of Petitioners	1
Interest of Amici Curiae	1
Summary of Argument	2
Argument	3
The Death Penalty Is a Cruel and Unusual Punishment Prohibited by the U. S. Constitution	3
Conclusion	16

IN THE

Supreme Court of the United States

OCTOBER TERM, 1971

EARNEST JAMES AIKENS, JR., *Petitioner*
v.
STATE OF CALIFORNIA } No. 68-5027

On Writ of Certiorari to the Supreme Court of California

WILLIAM HENRY FURMAN, *Petitioner*
v.
STATE OF GEORGIA } No. 69-5003

On Writ of Certiorari to the Supreme Court of Georgia

LUCIUS JACKSON, *Petitioner*
v.
STATE OF GEORGIA } No. 69-5030

On Writ of Certiorari to the Supreme Court of Georgia

ELMER BRANCH, *Petitioner*
v.
STATE OF TEXAS } No. 69-5031

On Writ of Certiorari to the Texas Court of Criminal Appeals

MOTION FOR LEAVE TO FILE BRIEF AMICI CURIAE

The movants hereto, Hon. Edmond G. Brown, former Governor of California, Hon. David F. Cargo, former Governor of New Mexico, Hon. Elbert N. Carvel,

former Governor of Delaware, Hon. Michael V. DiSalle, former Governor of Ohio, Hon. Philip H. Hoff, former Governor of Vermont, Hon. Theodore R. McKeldin, former Governor of Maryland, Hon. Endicott Peabody, former Governor of Massachusetts, Hon. Grant Sawyer, former Governor of Nevada and Hon. Milton J. Shapp, Governor of Pennsylvania, hereby respectfully move for leave to file the attached brief *amici curae* in this case The consent of the respondent, the State of Georgia, the respondent, the State of California, and the respondent, the State of Texas, was requested but was refused by all.

The interest of the foregoing individuals in this case arises from the fact that they are all presently or were formerly Governors in states where the death penalty is authorized by law, and in their official capacity as governors of their varied states have had intimate torturous experience with the death penalty.

While scholarly research and judicial logic can explore the application of theoretical bounds of the Constitution to the concept of capital punishment, these *amici* are uniquely qualified through personal experience to advise the court of the cruel and unusual nature of the death penalty. Each of these men has been in the position of sitting in final human judgment over the life of another human being; more final than that of the sentencing judge who had the knowledge that executive clemency might relieve him of the burden of taking another man's life; more final indeed, than the decision of this honorable Court. Each of these *amici* have witnessed the cruelty of the years-long suffering imposed upon the condemned, and the unusualness of the punishment in its discriminatory application to the poor, the ignorant, and the unpopular. Each can provide an

additional dimension to the question now before the court which counsel can only begin to suggest.

The brief of *amici curiae* is timely presented. Although time for filing briefs of the parties has passed, this Court has postponed consideration of these cases pending appointment of two additional Justices. The gravity of the question before the court, the finality (but for executive clemency) of its decision in these cases, and the fact that the court will neither be inconvenienced nor delayed due to the postponement of argument and decision in these cases, all suggest the propriety of the granting of this motion and the consideration by this Court of the brief *amici curiae.*

WHEREFORE movants respectfully request that this honorable Court grant leave to file the attached brief *Amici Curiae* in support of petitioners.

Respectfully submitted,

HON. EDMUND G. BROWN
HON. DAVID F. CARGO
HON. ELBERT N. CARVEL
HON. MICHAEL V. DISALLE
HON. PHILIP H. HOFF
HON. THEODORE R. MCKELDIN
HON. ENDICOTT PEABODY
HON. GRANT SAWYER
HON. MILTON J. SHAPP

By MICHAEL V. DISALLE
425 - 13th Street, N.W.
Washington, D. C. 20004
(202)-393-3300
Attorney for Amici Curiae

October, 1971

IN THE

Supreme Court of the United States

OCTOBER TERM, 1971

EARNEST JAMES AIKENS, JR., *Petitioner*
v.
STATE OF CALIFORNIA } No. 68-5027

On Writ of Certiorari to the Supreme Court of California

WILLIAM HENRY FURMAN, *Petitioner*
v.
STATE OF GEORGIA } No. 69-5003

On Writ of Certiorari to the Supreme Court of Georgia

LUCIUS JACKSON, *Petitioner*
v.
STATE OF GEORGIA } No. 69-5030

On Writ of Certiorari to the Supreme Court of Georgia

ELMER BRANCH, *Petitioner*
v.
STATE OF TEXAS } No. 69-5031

On Writ of Certiorari to the Texas Court of Criminal Appeals

BRIEF AMICI CURIAE IN SUPPORT OF PETITIONERS

INTEREST OF AMICI CURIAE

The subscribers to this brief are men who in their official capacity as Governors of their various states,

have had intimate, torturous experience with the death penalty. They are Hon. Edmund G. Brown, former Governor of California, Hon. David F. Cargo, former Governor of New Mexico, Hon. Elbert N. Carvel, former Governor of Delaware, Hon. Michael V. DiSalle, former Governor of Ohio, Hon. Philip H. Hoff, former Governor of Vermont, Hon. Theodore R. McKeldin, former Governor of Maryland, Hon. Endicott Peabody, former Governor of Massachusetts, Hon. Grant Sawyer, former Governor of Nevada and Hon. Milton J. Shapp, Governor of Pennsylvania.

Not until one has watched the hands of a clock marking the last minutes of a condemned man's existence, knowing that he alone has the temporary Godlike power to stop the clock, can he realize the agony of deciding an appeal for executive clemency.

SUMMARY OF ARGUMENT

The death penalty is not a deterrant to those who would willfully take the life of another. History has repeatedly shown that people who actually witnessed public legal executions were often those who were later convicted and executed for similar offenses. The converse is also true. In places where the death penalty has been abolished, there has been no rise in the number of willful homicides committed.

Capital punishment is a relic of barbarism, and the sadism of earlier societies' methods of execution is nonetheless present, even though modern "more humane" methods may dispatch the convicted more quickly. The life-for-a-life principal of penology satisfies nothing but a lust for revenge which is degrading to the fabric of our society.

Legal execution is unconstitutionally cruel because it leaves no room for redemption and rehabilitation and subjects the condemned to years of terror on death row, until reprieve after reprieve, false hopes raised and dashed, and witness to others on death row going to a final doom which is uncertain for them only as to date, finally drives the condemned beyond the point of madness.

The punishment of execution is unusual in its application because among those found guilty of willfull homicide, it is generally the poor, the ignorant and the politically unpopular who suffer its consequences. In 1965, with 9,850 homicides committed, there were seven executions; in 1966, one, and since then, none. Those selected for execution appear chosen at random from among the unprivileged, with no rational method of applying the death penalty to those who, by legislation, are subject to it.

ARGUMENT

The Death Penalty Is a Cruel and Unusual Punishment Prohibited by the U.S. Constitution

Generally, the people who sit in death row waiting to know whether the Governor will permit them to live or to die, follow a uniform pattern. They are men and women who generally have not had the finances necessary to enlist the services of the peculiarly talented counsel so essential in manning this type of defense. They are generally unschooled, often illiterate, many times mentally inadequate, and frequently the result of local hysteria which cries for a vengeance that is extremely fleeting. They are the exception rather than the rule. It seems that somewhere, someone believes that the execution of one man among the

hundreds that are charged with willful homicide will serve as an example or a deterrent to society. Is it a deterrent?

Three Presidents of the United States had been assassinated before John Fitzgerald Kennedy was shot down in Dallas. All of their assassins died. Booth, who shot Lincoln, was killed while trying to escape his pursuers; his accomplices were hanged. Garfield's assassin, a disappointed office seeker, was executed. So was the anarchist who shot McKinley. Did this deter the men who took pot-shots at Theodore Roosevelt, Franklin D. Roosevelt, or Harry S. Truman? All of the previous examples did not deter Lee Harvey Oswald. The fact that Oswald was killed by Jack Ruby should have served to satisfy those who were seeking vengeance. Instead, the killing of Oswald by Jack Ruby produced intense indignation on the part of our citizens. But if we say that Ruby as an individual should not seek revenge, should we, as a people, seek it collectively?

To emphasize the futility of the death penalty as a deterrent, we might briefly review the case of Charles Justice. Justice was sentenced in 1902 to the Ohio State Penitentiary after a cutting scrape. He was assigned as a trusty to the housekeeping duties of the death house. In those days, the electric chair was considered inefficient. Since it was too large for the small, nervous type of prisoner, it would cause him to squirm in his seat and cause the electrodes to make imperfect contact. As a result, the powerful current would arc between the electrodes and the doomed man's body, causing flesh burns and an unpleasant odor which discommoded the witnesses and officiating representatives of the state. Charles Justice corrected

this deficiency by designing iron clamps which are still in use. They immobilized the limbs of the condemned man during his death reflexes and thus made for a neater execution.

For his service to his state, Charles Justice was granted extra time off and was paroled in April, 1910. In November of the same year, Justice returned to the penitentiary, the charge; murder in the first degree. On October 27, 1911, undeterred Charles Justice died in the electric chair he had made more lethal, immobilized by the clamps he had invented.

How cruel is cruel? Capital punishment is a relic of barbarism. The Lord Chief Justice of England wondered if the death penalty might not be a trifle severe in view of the prisoner's age. The trial judge argued against mercy on the grounds that William York's punishment would be an example deterring others from a life of crime. So William York was hanged for stealing a shilling from the man to whom he was apprenticed. He was ten years old. The place was London. The time was 1748.

Britain has come a long way along the road to civilization in the two centuries since the hanging of William York. In October 1965, not only the House of Commons, but the usually stuffy House of Lords, with a surprising two-to-one majority, voted to abolish the death penalty for a test period of five years, which will probably prove permanent. This enlightened legislation, although still behind most of Western Europe's, is far ahead of the United States', and marks a definite global trend.

Capital punishment is a relic of barbarism, it is immoral, it usurps for society the exclusive privilege of natural laws, it is futile because it does not deter

the homocidal criminal, and its finality precludes any possibility of correcting an error.

The eye-for-an-eye, life-for-a-life concept of penology is obviously based on the degrading principle that society, in punishing the criminal, is seeking revenge rather than justice. The strong strain of sadism that runs through a vindictive society's clamor for a wrongdoer's blood is evident in the fact that until rather late in this century (in the Western world, at least) the execution of the condemned has been something of a spectator sport.

The executioners of the Far East have been far more inventive in their spectacular cruelty than any 20th Century Western country, with the possible exception of Nazi Germany. The Chinese, of course, have long been recognized as leaders in the field, with their boiling in oil, leisurely dismemberment (The Hundred Slices) and similar refinements. The Mogul emperors of India, however, should be recognized for their ingenuity in dispatching criminals as well as for their building of such monuments as the Taj Mahal. Impalement, for instance, was very popular (except with the victims) in 17th Century Delhi.

The man to be put to death by impalement (possibly for stealing a mango or a handful of roasted chickpeas from the Emperor Aurangzeb's palace kitchens) was paraded naked past the eager spectators to the killing grounds, where a sharpened stake of heat-tempered bamboo had been erected. Two men, each holding one of the prisoner's bound arms, would lift him clear of the ground while a third separated the buttocks so that when the culprit was lowered briskly, the bamboo lance would penetrate the rectum as far as the sigmoid flexure. The executioners could then

step back and join the delighted crowd in watching the dance of death as the screaming wretch writhed and pirouetted on his tiptoes in an effort to stay the inexorable progress of the murderous bamboo through his vitals. When sheer exhaustion and loss of blood finally forced the thief to his knees, the point of the bamboo stake pierced his heart and the show was over. Justice—or something—had been done.

The early Siamese did pretty well in the way of spectacular capital punishment by throwing their criminals to the crocodiles. This possibly gave the Romans the idea of throwing Christians to the lions, although the Romans got better exposure by building huge stadia for their lionization carnivals. This may have been an improvement over the earlier Roman form of capital punishment by crucifixion (in itself an improvement over the crude Jewish practice of lapidation, with no strictures as to who was to throw the first stone), but it was a failure as a deterrent to the spread of Christianity.

The ancient Greeks, with their more temperate and philosophic civilization, did not feel it necessary to borrow from the annals of Oriental cruelty in exterminating their undesirables and nonconformists. A quiet cup of hemlock did away with the lawless and the contumacious without fuss, feathers or cheering crowds.

The Greek example, however, did not deter the rest of Europe from linking justice with sadism. Spain during the Inquisition made notable advances in the field of cruel and unusual punishment with the rack, the wheel, flaying alive and burning at the stake, although the popularity of auto-da-fê spread to other countries. Even today, although Spaniards have

managed to transfer most of their hostilities to the brave bulls, the Franco government, perhaps out of sentimental longing for the good old days, still retains garroting as an official form of capital punishment. Only a few years ago—August 17, 1963, to be exact—two men found guilty of terrorist bombing were garroted in Madrid. Awakened at dawn to be fitted with adjustable steel collars, they were slowly strangled to death. The collars were tightened until eyes bulged and faces purpled, tightened still more until the windpipe was collapsed. The two men were then given the coup de grâce by the points of the tightening screws emerging cleverly from inside the backs of the collars to pierce the cervical vertebrae and crush the spinal cord.

Decapitation, once a popular form of capital punishment throughout the world, is now used sparingly despite an attempt by the Nazis to revive it during their brief but memorable rule of Schrecklichkeit. It was originally done by hand—with scimitar or cleaver in the East, with broadsword or ax in the West. Punitive head chopping was legally automated, however, as early as the 18th Century. The guillotine came into use in the early years of the French Revolution. Curiously, this lethal instrument, which became a symbol of the Reign of Terror, was originally suggested as a humane method of obviating the suffering attendant to executing the death penalty. Dr. Joseph Guillotin, a professor of anatomy appalled by the bloody extravagances of the French Revolution, carried on a campaign to humanize necessary killing, but resented the fact that his name was attached to the killing machine which he did not invent. Actually, the first "guillotine" was devised by Dr. Antoine

Louis, and was called, by contemporaries in his honor, a Louisette. It consisted—and still consists—of a trapezoidal knife weighing more than a hundred pounds, which drops ten feet between guide rails and slices on the bias through the neck of the condemned man who lies prone beneath it, his head immobilized by stock-like clamps. The severed head drops into a suitable container, while the body is rolled into a basket.

It was Dr. Guillotin's theory that this method of putting a man to death was the most compassionate, because the victim would feel nothing except perhaps a brief sensation of cold at the nape of his neck. Whether there is any intervening pain or the realization on the part of the severed head of its impossible position has never been confirmed or denied by any of the victims.

Executions by guillotine took place in a public square in Paris as late as 1939. The scaffolding and the weighted knife would be erected the night before, and although the accused died at dawn, there were always crowds on hand to be edified, if not deterred from crime, by the spectacle of the spurting carotid arteries, the ghastly surprised expression on the detached face, the reflex flopping of the headless body. Whether or not there was any appreciable deterrent effect, the grisly ritual is today privately performed behind the walls of La Santé prison on the Left Bank of the Seine.

Public hangings were abolished in England in 1868. At that time capital crimes numbered only a dozen, down from 200 in 1820. It is likely that the public spectacle was discontinued then because a royal commission had reported two years earlier that the death

penalty, even when witnessed by potential criminals, was no deterrent. The commission's report found that of the 167 persons executed in 1866, 164 had previously watched a hanging. This is not surprising, as the public executions used to attract huge crowds, and the crowds would attract dozens of pickpockets intent on plying the very trade for which the center of attraction was being hanged.

Public hangings persisted in America beyond the cutoff date in England, particularly in the Far West. The more spectacular forms of legal brutality were not practiced, however, even in the earlier Colonial days. There were, of course, occasional unofficial and nonintegrated autos-da-fé in some of the deeper parts of our Deep South, a practice that has carried over well into this century. But even the witches of Salem were not burned at the stake; they were decently hanged.

Crimes calling for the death penalty, however, were almost as numerous in Colonial America as in contemporary England. In 1636 hanging was the penalty in the Massachusetts Bay Colony for witchcraft, idolatry, blasphemy, assault in anger, murder, sodomy, buggery, statutory rape (the death penalty was optional for forcible rape), perjury in a capital case and rebellion. The Old Dominion of Virginia ranked the degree of criminality according to race, color and current condition of servitude. Seventy crimes were listed as capital for Negro slaves, but only five for whites.

It was inevitable that an emerging nation like the United States, aspiring to world leadership in science and invention and the practical application thereof, would sooner or later abandon hanging for a modern,

efficient, scientific and more "humane" method of legal murder. In 1880 the state of New York abolished the gallows in favor of a newfangled "electric chair." Thirteen years later a man named Kemmler lost his court battle to have the new monster declared unconstitutional as "cruel and unusual punishment," and became the first man to be punished electrically for his misdeed—an ax murder. The contraption was a success technically, since it killed Kemmler, but the humanity of the experiment was doubtful. Either the machine misfunctioned or the executioner did something wrong. There was considerable searing of flesh and the human guinea pig apparently died in agony.

Techniques have been improved in the 70-odd years since, and it is now generally agreed that death by electrocution is practically painless. While pathologists still argue over the exact mechanics of death by electricity—some believe the heart muscles are paralyzed; others are just as certain that paralysis of the respiratory centers causes death by asphyxia—most of them concede that the victim loses consciousness almost instantly. The tremendous electrical surge raises the temperature of the body to the boiling point and sears the brain to insensibility in a fraction of a second. The jerking and writhing that nauseate witnesses are not signs of a death struggle but purely reflex reactions of the muscles to an electrical impulse.

An expert hanging is also supposed to extinguish consciousness at the end of the drop. The snap of the rope grown taut theoretically breaks the neck and severs the spinal cord. The frantic kicking, the jerking arms, the ejaculation of sperm in men, are all unconscious nervous reflexes. Of course there have been many bungled hangings—defective traps, ropes that

broke, inexpert knots that merely choked the man to death. There is a record of an early English hanging of a half-starved female criminal who dropped through the trap and dangled at the end of the rope, eyes bulging with dread, because she was not heavy enough —she was a small 12-year-old girl—for the fall to break her neck. The hangman had to go down the 13 steps, grab her legs and add his weight to hers to carry out the sentence.

In 1921 the Nevada state legislature came up with the latest contribution to the fine art of killing criminals. It was not only scientific, quick and efficient; it introduced a new "humane" note: It would eliminate the torture of apprehension. Poison gas would be introduced without warning into the cell of the condemned man while he was asleep. He would die peacefully, and nobody's conscience need be disturbed by witnessing a death struggle. When a murderer named Gee Jon was sentenced to this new-style death three years later, it happily occurred to someone that the bars of Gee Jon's cell could hardly be expected to contain the lethal gas intended exclusively for Gee Jon's gentle extinction. Rather than risk exterminating the entire population of the penitentiary, instead, the penal authorities postponed the historic execution until a special gas chamber could be built.

Nine states besides Nevada now poison their capital criminals with gas. The best-known gas chamber of them all is California's, perhaps because Caryl Chessman died there after a legal fight that lasted 12 years. Chessman had a long record of charges against him, but the one for which he was finally executed was that of forcing a girl to move from one car to another at gunpoint. This is technically kidnaping in Cali-

fornia and is punishable by death under California's "Little Lindbergh Law."

Because there were many newsmen among the 60 witnesses who came to San Quentin for Chessman's execution, millions read descriptions of how a man dies by inhaling poison gas. It is a death not much different, they found, from hanging or electrocution. Looking through glass panels of the hermetically sealed gas chamber, the reporters saw the doomed Chessman enter and without hesitation sit down in the death chair, watch without expression while his arms and legs were strapped down. A clutch of cyanide "eggs," poised above a tub of acid beneath the chair, was released by remote control. As the fumes rose to shroud the prisoner, his eyes bulged, his head jerked, he gagged and gasped as he seemed to be struggling against the straps. In two minutes his long jaw sagged and his body slumped.

According to medical men, the gaseous cyanide derivatives are neurotoxins that attack the nerve centers and paralyze the cardiac and respiratory functions at the first deep whiff. The signs of a desperate death struggle, apparently the symptoms of great suffering, are again nothing more than unconscious reflexes.

So what is the meaning of all this scientific progress that we in America have made in the centuries and centuries since the boiling in oil, the crucifixions and the hanging of little children? We have perhaps reduced the coefficient of suffering to within a fraction of a second of the instantaneous extinction of the guillotine, which the late Albert Camus described as "a crude surgery [without] any edifying character whatever." We have reduced our lust for public blood-letting to boxing (which is becoming more and

more bloodless), auto racing and professional football. We no longer feed our wrongdoers to the crocodiles or invite VIPs to public hangings, as was the custom in Arizona, but we still kill our criminals in three quarters of our American states. We are far ahead of the rest of the world in the scientific technique of legal killing, but we are at least a century behind in the sociological, psychological, economic and humanitarian approach to the problem of crime and punishment.

Why do we still kill our killers? Do we imagine that we are doing justice, with no thought of vengeance? Do we think we are eradicating crime? Are we deluding ourselves that by snuffing out the lives of our misfits, our nitwits and our psychopathic personalities (who, our psychiatrists hasten to add, are not congenital psychopaths), are we creating a better world for ourselves? Do we really think that punishment will prevent crime, that killing murderers will prevent murder?

Where do we draw the line? It is certain that we would consider the Oriental methods of execution cruel. We would consider other methods that have since been tried cruel. Does death by a firing squad or gas or electricity become less cruel because these methods are used in the name of law and order in the free democracy of the United States of America? The actual act of execution is not only cruel in and of itself, but it is more than cruel if we are to contemplate the days and the nights of a man who is awaiting execution in the name of society by a soverign state. This usage of cruelty and cold-blooded premeditated murder is certainly a poor example of the humanity of a civilized people.

Is capital punishment unusual? In the year 1966, one person was executed by the 37 states still retaining the death penalty. In the year 1965, with 9,850 homocides committed, there were 7 executions. Year after year the number of men convicted of homocide and sentenced to life continues to increase in every state penitentiary where capital punishment is a part of the law. The number of persons executed even before the unofficial moratorium of 1967 has been gradually decreasing which makes the use of the death penalty more and more unusual. It is the person who commits the crime in an aroused community who is executed. It is the person without proper legal representation. It is the person without financial resources.

More and more the world has given recognition to the sacredness of life. Seventy-three countries have abolished the death penalty as well as 13 states of the United States. Yet, in no instance has there been an eruption of crime. For example, Michigan, which has not had capital punishment since 1947, over a period of years has had a lower rate of homocide than its adjoining states. The same is true with Maine, Rhode Island, Minnesota, Wisconsin, and North Dakota.

Often the death penalty is used as an excuse for not doing those things that should be done, such as improving corrections, developing a sounder approach to rehabilitation, and providing a more modern parole system. It seems almost unbelievable that in the year 1971 there should be continued reliance on the destruction of an occasional life with all its self-demeaning consequences. This is truly an instance where the Supreme Court of the United States speaking on behalf of the Constitution of the United States could restore justice to all.

CONCLUSION

For the reasons stated, the judgments of the Courts below should be reversed.

Respectfully submitted,

HON. EDMUND G. BROWN
HON. DAVID F. CARGO
HON. ELBERT N. CARVEL
HON. MICHAEL V. DISALLE
HON. PHILIP H. HOFF
HON. THEODORE R. MCKELDIN
HON. ENDICOTT PEABODY
HON. GRANT SAWYER
HON. MILTON J. SHAPP

By MICHAEL V. DISALLE
425 - 13th Street, N.W.
Washington, D. C. 20004
(202)-393-3300

Attorney for Amici Curiae

October, 1971